



A REPORT
TO THE
MONTANA
LEGISLATURE

PERFORMANCE AUDIT

*Montana School
for the
Deaf and Blind*

Board of Public Education

JUNE 2008

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DIVISION

07P-13

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June 2008

The Legislative Audit Committee
of the Montana State Legislature:

This is our performance audit of the Montana School for the Deaf and Blind. This report provides the legislature information about the operations of the Montana School for the Deaf and Blind. This report includes recommendations to the Board of Public Education and the Montana School for the Deaf and Blind for securing additional federal funds and improving outreach workload management.

We wish to express our appreciation to the Montana School for the Deaf and Blind personnel and the Board of Public Education for their cooperation and assistance during the audit.

Respectfully submitted,

/s/ Scott A. Seacat

Scott A. Seacat
Legislative Auditor

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REPORT SUMMARY

Montana School for the Deaf and Blind

Montana School for the Deaf and Blind does a quality job of providing services to its students; however, improvements could be made to manage workload.

Audit Findings

The performance audit of the Montana School for the Deaf and Blind (MSDB) had three positive conclusions, two of which related to the on-campus services provided to students and one in the area of school safety.

Statutory guidance for the Montana School for the Deaf and Blind details specific services the schools must provide. State law requires the school to provide an education commensurate with sighted and hearing peers that will enable the students to become independent and self-sustaining citizens. As well, statute requires the school to assist students in locating suitable employment. Based on our review of accreditation standards, educator credentials, recruitment and retention data, student assessment scores, academic curriculum, and parent survey responses, we conclude MSDB provides its students an education similar to that provided to students in public schools. Based on audit work, we also conclude MSDB provides transition, independent life skills and work experience programs in compliance with state law. These programs focus on providing students with the knowledge and experience to transition into independent adults.

Audit work found MSDB has taken steps to assure student safety on campus. The school meets all of the Office of Public Instruction's (OPI) state guidelines for a safe school. In addition, the school has taken precautionary steps to provide assurance the school is a safe place. Such steps include video surveillance, installing new doors and working with the Great Falls police to establish a crisis management plan.

Audit Recommendations

The performance audit of MSDB includes two audit recommendations. One relates to the school's potential eligibility for additional federal funds and the other recommendation seeks to improve the school's workload management.

Chapter II addresses MSDB's funding sources. Audit work found MSDB may be eligible to receive additional federal funds by using free and reduced lunch counts as a poverty factor. We recommend the school work with OPI to examine the efforts required to comply with Title I of No Child Left Behind and if appropriate, ensure the school receives equitable distributions of Title I and state at-risk funds. Furthermore,

we recommend MSDB and OPI work together to secure Individuals with Disabilities Education Act funds for the school based on the poverty factor.

Chapter V discusses outreach services provided by MSDB to students in Montana's public schools. MSDB provides outreach services to public schools throughout the state. The majority of students served by MSDB are through its outreach services. For the 2007-2008 school year, outreach caseload comprised approximately 330 students. Audit work revealed outreach caseloads have increased over a three year period. However, management does not collect data on workload activities to effectively manage growing caseloads. We recommend the school determine relevant workload factors and collect data on such factors to help MSDB better manage their outreach caseloads.

Chapter I – Introduction And Background

Introduction

Based on direction from the Legislative Auditor, a performance audit of the Montana School for the Deaf and Blind (MSDB) was initiated to examine funding, safety, education, outreach services, and the school's ability to promote self sustainability among students. Initially, we conducted an audit assessment and determined a performance audit was warranted and feasible. Through our audit assessment, we identified areas in which to focus audit work.

Audit Scope and Objectives

Performance audit work focused on school funding, as well as educational and transitional services offered by the school. Audit scope focused primarily on educational services provided through teaching, core curriculum, outreach and the employability/transition program. Audit work pertaining to educational services examined recruitment and retention issues as well as compliance with statute. Audit scope encompassed an assessment of safety measures and examined revenue and expenditures for the school. We established five objectives to focus our audit scope.

1. Determine if MSDB's use of funds is aligned to the school's purpose, and if the school is eligible for any additional federal school funding allocations.
2. Determine compliance with statute stating MSDB must provide an education commensurate with that of sighted and hearing peers.
3. Determine compliance with statute relating to students becoming self-sustaining citizens and locating employment.
4. Determine the level of safety measures on the MSDB campus.
5. Examine efficiency of the outreach program.

In addition to achieving audit objectives, this report provides an overview of MSDB to the legislature.

Audit Methodologies

To address the above-mentioned objectives, we reviewed accreditation standards, test data for the 2006-07 school year, and analyzed funding information for fiscal years 2005-2007. We also reviewed MSDB's spring 2007 survey results from students, parents, and public school teachers working with MSDB. Additional methodologies included:

- ♦ Contacted community employment partnerships.
- ♦ Analyzed workload information for outreach consultants.
- ♦ Compared MSDB teacher salaries with teachers at other deaf/blind schools in the region as well as public school teachers in the state.

- ♦ Reviewed applicable state and federal laws, as well as spoke with individuals on the federal level regarding grant eligibility and formula determinations.
- ♦ Observed and tested safety measures.
- ♦ Reviewed outreach position descriptions.
- ♦ Reviewed state accreditation standards.

Summary of Audit Findings

Overall, audit conclusions were positive and there were no areas of noncompliance. The education and transition services provided on the MSDB campus to deaf and blind students comply with statutes detailed in Title 20, chapter 8, MCA. Additionally, there is a presence of safety measures on campus. Audit work found the majority of MSDB's expenses are spent in program areas which provide services for education and promote independence. Additionally, the school may be eligible for additional federal moneys they are not currently receiving. The final audit finding speaks to the improvement of workload management for outreach services.

Background

MSDB is a state supported special purpose school which serves as a center of technical expertise for the education of deaf and blind children, providing programs and assistance throughout the state. MSDB's current enrollment is 57 students, 24 in high school and 33 in the elementary grades. MSDB opened in Boulder in 1893 with ten students enrolled. In 1934, the school moved from Boulder to a new facility in Great Falls, located on a ten-acre campus donated by the city. The school is currently located in Great Falls. MSDB functions as both a day school, residential school, and provides outreach services across the state. The school operates under the authority of Title 20, chapter 8, MCA, and the governance of the Board of Public Education (BPE). In addition to governance of MSDB, BPE is responsible for general supervision of elementary and secondary schools in the state. The Board of Public Education was created by the Montana Constitution and consists of seven members appointed by the Governor and confirmed by the Senate.

MSDB's Purpose

The purpose of the school focuses on providing educational opportunities for deaf/hard of hearing and visually impaired children, equivalent to those afforded their hearing and sighted peers, enabling them to become independent and self-sustaining members of their communities. MSDB's purpose is achieved through two main areas. First, using specialized instruction and training, MSDB provides an education for deaf and blind children appropriate for their needs in a residential campus setting. This education enables children being served by the school to become independent and self-supporting members of their communities. Second, MSDB serves as a resource for parents of deaf and blind infants/toddlers and for school districts where deaf and blind children are

enrolled. Today the campus-based education program serves approximately 57 students from preschool through the 12th grade and about 360 students through its outreach program. MSDB employs 30 teachers/specialists.

Enrollment Process at MSDB

MSDB's admission procedures are outlined in its *Student/Parent Handbook*. These procedures require local school districts to submit a request to MSDB to determine the educational needs of students identified as having the qualifying disabilities of deafness, or visual impairment and whether placement at MSDB is the most appropriate and least restrictive in meeting those identified needs. Enrollment at MSDB is contingent on the outcome of the evaluation and a recommendation from an MSDB evaluation team. In accordance with an interagency agreement between the Office of Public Instruction and MSDB, a student may not be placed at MSDB by an individual's educational team without the concurrence of the MSDB representative.

Residential Services for Students Living on Campus

The majority of students attend MSDB as a day school, but approximately 20 students reside in on-site dormitories. Students living on campus have house parents who assist with students' needs outside of typical school hours. During school hours, the residential program maintains a staff of health service workers, kitchen and dining room staff, and housekeeping staff. All of the residential program administration and counseling staff have college degrees and the appropriate licenses. All house parents complete training as certified childcare workers during the first year of their employment at MSDB. The residential facility has a 90-bed capacity. It consists of two cottages, each with three wings connected by a food service building. Bedrooms are designed to accommodate two students.

Figure 1
Glacier Cottage Student Dormitories



Source: Images taken by the Legislative Audit Division.

Breakfast and dinner are served in the individual cottages, and lunch is served in the dining room during the week. Students in residential placement must not be a danger to self or others, must be able to live cooperatively with other students, accept and take direction from staff, and demonstrate self-help skills. Students living on campus travel home once each month during the school year. These school breaks vary in length from two weeks at Christmas to travel weekends beginning on a Friday and extending to the following Monday. The school provides travel for students at no cost to the parents.

MSDB has Four Program Areas

In addition to the Residential or Student Services program, MSDB has an education, administration, and general services program. The 2007 legislature appropriated funding for the following number of FTE in each of the program areas.

Education	49.87
Student Services	29.74
Administration	5.00
General Services	<u>4.00</u>
Total	88.61

MSDB Foundation Provides Financial Assistance to the School

In addition to federal and state funding, MSDB, receives monetary assistance from the Montana School for the Deaf and Blind Foundation, Inc. The Foundation is incorporated under section 20-8-111, MCA, and is governed by a Board of Directors. The foundation's board of directors is comprised of individuals from across the state. The Montana School for the Deaf and Blind Foundation, Inc. was created by the Montana Board of Public Education in 1981, and is charged with the responsibility of receiving and managing funds for the benefit of children with vision or hearing impairments who are served by the school. The Foundation provides private funds for educational and adaptive technology instruction, proms, homecoming festivities, winter and summer camps, cottage furnishings, field trips, achievement awards, special vision and hearing evaluations, eyeglasses and hearing aids, vocational evaluation and career development opportunities.

Chapter II – MSDB Funding

Introduction

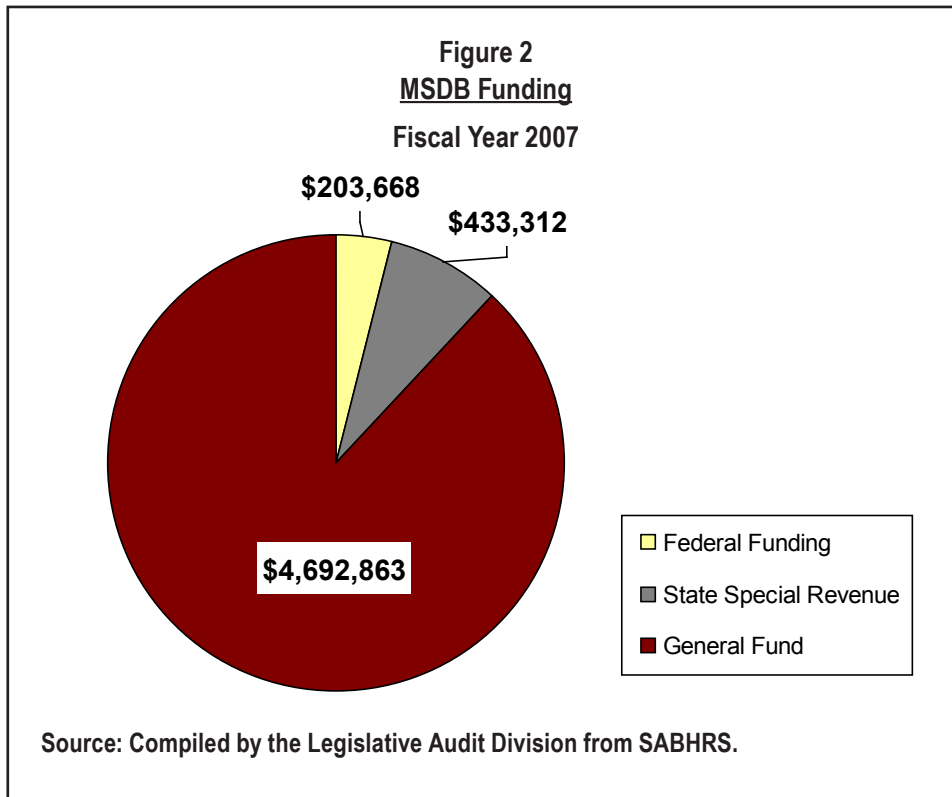
Our first objective was to determine if the Montana School for the Deaf and Blind's (MSDB) use of funds is aligned with the purpose of the school, and if the school is eligible for any additional federal funds. The vision and purpose of MSDB is to promote and maintain educational opportunities for every deaf/hard of hearing, and visually impaired child in Montana and promote the highest potential of independence and self-sufficiency for the students. In order to achieve the first objective we conducted financial data analyses using MSDB trial balances for fiscal years 2005, 2006, and 2007. We reviewed data by types of expenditures and revenues and compiled the data by program (Administration, Education, General Services, and Student Services).

In addition to analyzing how MSDB uses current funds, we reviewed federal funds received by MSDB and compared them with those received by other public schools as well as other deaf/blind schools. We spoke with federal officials at the Department of Education and state personnel at the Office of Public Instruction (OPI) regarding MSDB's eligibility for meeting the requirements for federal funds. Based on enrollment and poverty data for MSDB, we computed potential federal fund allocations.

This chapter discusses how MSDB uses its current funds, as well as discussing possible eligibility for additional federal funds.

Current Funding Sources

MSDB receives funding through the State Special Revenue Fund (trust lands), federal funds, and the state General Fund, with the majority of funding coming from the state General Fund. For fiscal year 2007, MSDB received total funding of approximately \$5.3 million. The following figure illustrates the proportion of funding sources. MSDB is not considered a school district in the state of Montana because it does not have geographical boundaries from which to draw taxpayer moneys or census data and it serves all students in the state.



How Do Other States' Appropriations Compare to MSDB?

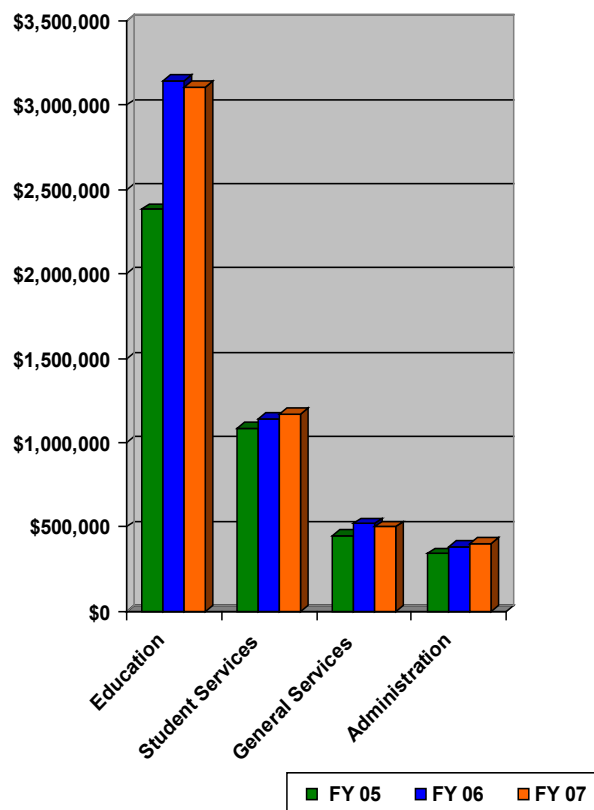
As stated above, MSDB funding for fiscal year 2007 was \$5.3 million. In comparing similar state funded special purpose schools for the deaf and blind, Colorado's School for the Deaf and Blind's appropriation for fiscal year 2007 was approximately \$6.3 million, and the Idaho School for the Deaf and Blind received approximately \$8.1 million in fiscal year 2007. As well, both Colorado and Idaho schools derive a majority of their funding from the state's General Fund. All three state schools (MT, ID, CO) are similar in their offering of residential services. Enrollment numbers at MSDB are similar to that of Idaho's School for the Deaf and Blind. Idaho's current enrollment is approximately 60 students whereas MSDB's is 57. Colorado however, has a much higher enrollment at 220 students. It is interesting to note the enrollment trends within each school. Both Idaho and Montana serve a smaller number of students on campus and a higher number of students, 900 and 360 respectively through outreach in the public schools. Colorado's enrollment trend is opposite that of Montana and Idaho. The campus in Colorado Springs serves 220 students, whereas school outreach only serves 30 students.

The Majority of MSDB Funds are Used in the Education and Residential Programs

The School's purpose is to promote educational opportunities and the highest potential of independence and self-sufficiency for its' students. To determine if MSDB's use of funds is aligned with its purpose, we analyzed expenditure trends over a three-year period. We looked at fiscal years 2005, 2006, and 2007. MSDB categorizes its finances into four program areas: Education, Student Services, General Services and Administration. Overall, expenses increased over a three-year period, but many programmatic expenses fluctuated throughout the three-years. Figure 3 details the expenditures over a three year period at MSDB by program.

As the figure illustrates, the Education Program comprises the majority (57percent) of expenditures for MSDB. The Student Services program consists of approximately 23 percent. The Administration and General Services program expenses constitute the smallest amount of moneys spent at roughly 10 percent each of total expenditures at MSDB. MSDB spends the majority of its funds in program areas which provide educational services to students and promote independence and self-sufficiency.

Figure 3
MSDB Expenditures by Program
Fiscal Years 2005-2007



Source: Compiled by the Legislative Audit Division from SABHRS.

CONCLUSION

A majority of funds are spent in areas designed to provide services in accordance with the school purpose.

Approximately 80 percent of total MSDB funds are directed toward services for students.

Federal Funds are a Small Portion of MSDB's Budget

As discussed earlier, although General Fund comprises the majority of MSDB's budget, federal funding is a component as well. Over the past three fiscal years, federal funding provided to MSDB has increased slightly from \$175,000 in fiscal year 2005 to \$204,000 in fiscal year 2007. Although federal funding has increased, it still comprises the smallest portion of funding appropriated to MSDB. Through audit work we found the school may be eligible for additional federal funds. The following sections detail MSDB's potential eligibility for approximately \$27,000 in federal funds.

IDEA Funds Comprise the Majority of Federal Funding

The majority of MSDB's federal funding comes from the Individuals with Disabilities Education Act (IDEA). MSDB received a total of \$112,355 (FY 07) in federal IDEA funds. A portion of this funding comes from a formula grant and the other portion of IDEA funding is given to MSDB at the OPI's discretion. These grants provide financial support to states and local districts to ensure the rights of children with disabilities are protected. These federal funds are applied for by the OPI and distributed to the schools in formula grants based on annual enrollment and poverty numbers as well as a base amount which remains constant from year to year.

MSDB May Be Eligible for Additional IDEA Funds

During fiscal year 2007, OPI was awarded approximately \$33 million in IDEA funding from the Federal Office of Special Education Programs. For the same time period, MSDB received \$52,355 in IDEA formula grant moneys. The grant funds are allocated to local districts based on the number of students enrolled as well as the number of students living in poverty. MSDB and state correctional schools do not have district boundaries from which to draw poverty census data; therefore, OPI distributes IDEA formula grant moneys to MSDB and state correctional schools based solely on enrollment numbers. Through audit work, we determined federal law allows for the use of free and reduced lunch counts to determine the number of students living in poverty at state special purpose schools. OPI can continue to use census poverty data for schools in which it is available, but for MSDB, free and reduced lunch counts can be used as the poverty

factor in the IDEA formula. Adding the poverty count to MSDB's grant formula would reallocate approximately \$3,000 to MSDB. Although \$3,000 is not financially material, the amount may change depending on the population of the school. It is important to note that the additional \$3,000 for which MSDB may be eligible is a reallocation of the existing \$33 million OPI receives.

MSDB May Be Eligible for Title I Allocation Moneys

MSDB does not receive Title I of the No Child Left Behind Act (NCLB) grant moneys. Title I moneys are provided to states to ensure all children have a fair and significant opportunity to obtain a high-quality education and reach proficiency on state academic achievement standards and assessments. Title I grants are applied for by OPI and distributed to the schools based on a formula determining the ratio of school enrollment to students living in poverty. OPI uses census poverty data to formulate grant amounts to schools. Similar to the IDEA grant, federal guidance indicates free and reduced lunch counts can be used in place of census poverty data to determine grant awards and that the best available data should be used. These provisions are contained in a section of Title I guidance OPI has not previously used.

An issue with using free and reduced lunch counts as a poverty factor for federal grants is that the data may not be as complete as census poverty data. In order for a school to obtain the number of students eligible for free and reduced lunch, parents must fill out and return a form to their child's school stating the family's income. Schools cannot require parents to do this; however, using census poverty data is not an option for MSDB, and free and reduced lunch counts is the best available data for MSBD.

Based on enrollment and poverty data for the 2007-08 school year, MSDB maybe eligible for approximately \$21,000 in Title I grant funds. The funding would come from the total grant for the state; a portion would be reallocated to MSDB. MSDB students are part of the demographics, as are all students in the state, used by OPI to apply for Title I funds. Therefore, an equitable distribution would include MSDB in Title I allocations. Reduced funding impacts MSDB's ability to offer students transition services. In addition, the School currently has limited funds for professional development. Per NCLB law, schools receiving Title I moneys are required to demonstrate academic student progress, as well as, an effort to involve parents in the process of educating their children. Title I moneys are restricted to use for improving academic achievement of students of low socio-economic status. MSDB conducts and submits annual assessments to OPI; however, upon receiving Title I moneys, OPI would be required to submit assessment results to the federal Department of Education along with all other public schools in Montana.

In addition to federal grant funds, MSDB may also be eligible for State of Montana at-risk funds for schools. The State of Montana provides at-risk moneys to all schools receiving Title I funds. MSDB could potentially receive these state moneys if the school began receiving Title I funds. State at-risk moneys for MSDB would equate to roughly \$2,600. This could provide MSDB with an increase of \$23,600 in state and federal moneys.

Summary

MSDB receives a portion of IDEA federal grant funds but may be eligible to receive additional funds. Similarly, MSDB has never received Title I grant funds. Free and reduced lunch counts can be used in both formula grants as the poverty factor instead of using district census poverty data. By doing so, MSDB could potentially receive an additional \$27,000.

RECOMMENDATION #1

We recommend the Montana School for the Deaf and Blind work with the Office of Public Instruction to:

- A. Examine the efforts required to comply with Title I of No Child Left Behind and if appropriate, use free and reduced lunch counts as the poverty factor to ensure the school receives equitable distributions of Title I and state at-risk funds.*
 - B. Secure Individuals with Disabilities Education Act moneys for the school based on the poverty factor.*
-

Chapter III – On Campus Services Provided To Students

Introduction

Statutory guidance for the Montana School for the Deaf and Blind (MSDB) details specific services the school must provide. Section 20-8-102(4), MCA, states MSDB must provide an education to students which is commensurate with that of their sighted and hearing peers that will enable the students to become independent and self-sustaining citizens. State statute also requires the superintendent to assist students in locating suitable employment (20-8-116, MCA). We address the following two objectives in this chapter:

- ♦ Determine compliance with statute stating MSDB must provide an education commensurate with that of sighted and hearing peers.
- ♦ Determine compliance with statute relating to students becoming self-sustaining citizens and locating employment.

Audit work included interviews with MSDB, Board of Public Education (BPE) and Office of Public Instruction (OPI) personnel. The review of state accreditation standards, applicable MCAs, parent and student survey results, student assessment scores and annual teacher evaluations was comprised in audit work as well. We also verified teacher certification and school accreditation status. Interviews were conducted with MSDB administration, as well as residential staff to obtain information on the transition and independent skills program. Post graduate status data was analyzed to determine student activity after graduation. Our audit work reviewed MSDB survey responses of parents and high school seniors for applicable information. Community employer partnerships for the transition program were contacted and interviewed. This chapter details audit work regarding the education provided, as well, as services to assist students with becoming independent, self-sustaining citizens and locate employment.

Factors to Measure a Commensurate Education

To measure whether MSDB is providing an education commensurate with sighted and hearing peers, we evaluated and compared several common factors evident at both public schools and the School for the Deaf and Blind in Montana. We used state accreditation standards, educator credentials, recruitment and retention data, student assessment scores, academic curriculum, and parent survey responses as measurement of the education provided at MSDB compared to that of public schools. Many of the above-mentioned factors (teacher credentials, assessment scores, curriculum) are components of state accreditation standards. Audit work on these duplicative factors is only discussed within the context of accreditation standards.

MSDB Chooses to Meet State Accreditation Standards

In order to determine if MSDB's education is commensurate with that of public schools in Montana, we reviewed state accreditation standards set forth for public schools. Section 20-7-102, MCA, states "conditions under which each... school operates must be reviewed... to determine compliance with the standards of accreditation." As stated in the OPI accreditation procedures manual, maintaining consistent standards throughout all public schools guarantees students the benefits of attendance in accredited schools and provides a basis for transfer. In addition, accreditation standards serve as a foundation for a system of quality education. The main operational categories in which schools are reviewed for compliance with accreditation standards are:

- ♦ Professional Development
- ♦ Student Assessment
- ♦ Program Standards
- ♦ Licensed Staff

MSDB chooses to meet state accreditation standards, and it complies with the majority of the accreditation requirements. However, according to statute MSDB is not required to be an accredited school. Per section 20-7-101, MCA, "standards of accreditation for all schools must be adopted by the Board of Public Education upon the recommendations of the Superintendent of Public Instruction." MSDB does not meet the definition of school in this above-mentioned statute. As delineated in section 20-8-101, MCA, the school is required to operate as a separate and independent unit under the supervision of the Board of Public Education. Outlined below is an overview of the primary areas of accreditation and how MSDB is meeting standards in these areas.

Professional Development

MSDB provides professional development to its teachers and staff. As required by accreditation standards, public schools must provide opportunity and require teachers participate in three pupil instruction related (PIR) professional development days. MSDB requires staff to attend two professional development days prior to the start of each school year. In addition, the superintendent of MSDB attempts to get teachers and outreach consultants training from applicable professional organizations. Typically, several individuals attend an out-of-state conference annually and the MSDB foundation pays for their expenses. Out-of-state opportunities are important for MSDB teachers because of the specialty to which they teach. In Montana, the teachers and outreach consultants at MSDB are considered the experts in their field. In order to receive professional training within their niche, MSDB staff must travel out of state or bring in a trainer from out of state.

Student Assessment

Accreditation standards require all public schools to administer state level student assessments annually in language arts, mathematics, science and social studies. All assessment results are provided to OPI. The assessment chosen and required by the state is the Criterion Reference Test (CRT). In an attempt to meet this accreditation requirement and at the same time recognize the individual needs of students at MSDB, the school also administers the Wechsler Individual Achievement Test (WIAT). The WIAT measures the grade level in which the student is functioning.

Overall, deaf and blind students do not test or graduate at grade level. A national estimate, as well as an estimate from staff at MSDB, is that deaf and blind students graduate on average at about a 4th grade level. School personnel say it is very difficult to determine an average which is representative of the student population due to the wide ranging levels. There are students at grade level when they graduate and there are those considerably below grade level upon graduation. For the 2006-07 school year, MSDB graduated 14 students. For the current year (2007-08), there will be two graduates. All students graduate upon meeting the annual measurable goals laid out in their individualized education program.

Program Standards

Accreditation standards require public schools to align curriculum to meet state developed content and performance standards in each program area. MSDB teaches core academic program areas similar to public schools such as math, language arts, science, and social studies. MSDB is a member of the Golden Triangle Curriculum Cooperative which establishes and provides academic curriculum based on state standards to Class C schools throughout Montana. MSDB does its best to meet content standards in each program area, while taking into account the individual needs of each student.

Licensed Staff

Accreditation standards require all teachers to have a Montana teaching license and be appropriately endorsed in the areas they teach. In reviewing teacher and outreach credentials, we found not all MSDB teaching staff have a current Montana teaching license, nor are all staff endorsed with a special education endorsement. Figure 4 illustrates the percentage of teachers with a current Montana teaching license as well as a special education endorsement.

MSDB's position description for teachers and outreach consultants requires a special education endorsement as a qualification for employment. However, as illustrated in Figure 4, 19 percent of current teachers at MSDB do not hold a special education endorse-

ment. It is important to note that over half of the teachers who do not have a special education endorsement, are working on a masters degree in deaf or blind education, which will enable them to receive a special education endorsement.

Montana's special education endorsement is non-categorical, meaning

postsecondary training in Montana does not focus on any one specific area of disability, but rather covers a broad overview of disabilities. Therefore, a teacher may have a special education endorsement and know very little about teaching deaf or blind students. Conversely, a teacher may have experience working with deaf and blind students but not have a Montana special education endorsement. The staff without a teaching license represents one individual who is not currently in a teaching position.

How Montana Compares with Other Schools' Licensure Requirements

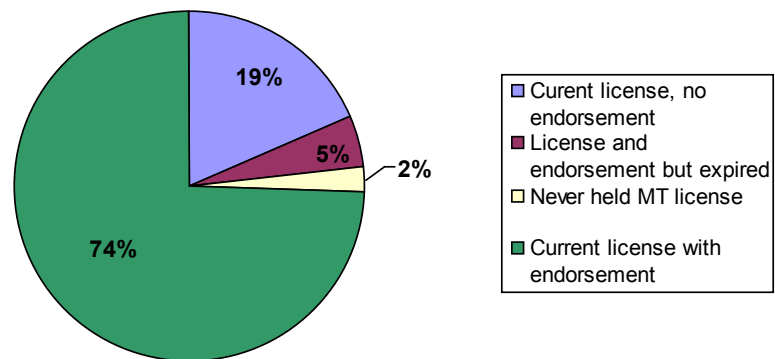
Neighboring deaf blind schools in Colorado and Oregon require teachers to have a degree in deaf education or teaching the visually impaired prior to being hired at these schools. In Idaho, however, they sometimes hire teachers without a teaching license or the proper endorsements due to recruiting difficulties similar to Montana. When an individual is hired without the proper teaching credentials, the teacher is required to attain the proper endorsement or teaching license within three years of working at the Idaho School for Deaf and Blind.

MSDB's Accreditation Status

The Office of Public Instruction issued a letter for the 2006-07 school year stating the Board of Public Education has granted MSDB regular accreditation status for both the high school and elementary programs at MSDB. Per ARM 10.55.605, regular accreditation status means a school has:

- ♦ Its program aligned to the content and performance standards and program area standards.
- ♦ Certified staff appropriately assigned, and fully utilized.

Figure 4
Percent of MSDB Teachers Licensed and Properly Endorsed
Fall 2007



Source: Compiled by the Legislative Audit Division from agency records.

- ♦ Adequate programs and resources.
- ♦ Facilities meeting appropriate standards.
- ♦ Trustees, staff, parents, and community working together to provide a quality education.

Another aspect of a commensurate education is to ensure quality staff. One measure of quality staff is the ability to recruit and retain quality educators.

Recruitment and Retention

MSDB has difficulty recruiting teachers, as well as outreach consultants, due to several factors. Teachers of the deaf and blind are a minority population among educators nationwide. There are few individuals trained to teach deaf or blind students. In addition, there are a limited number of postsecondary programs that offer training in these areas; which means fewer students are graduating with formal training in teaching deaf and blind students. Montana does not offer any postsecondary programs to train teachers of the deaf or visually impaired. Another factor involved is the economics of Montana. Specifically, MSDB's annual wage for teachers has been historically low. For example, during the 2006-07 school year an entry level teacher (BA, no experience) salary was \$26,000. For the current school year, MSDB has been able to increase salaries to be more competitive with public schools. The entry level teacher salary for the 2007-08 school year is \$27,000. MSDB strives to pay teacher salaries comparable to the Great Falls School District. However, funding for MSDB relies primarily on state General Fund. The district cannot seek property tax mill levy increases to provide additional compensation as other public schools in the state can, and do.

MSDB is currently just slightly below the salaries of Great Falls teachers. For example, when compared to teachers in the Great Falls School District, a teacher at MSDB makes anywhere from 89 percent to 98 percent of what Great Falls teachers make. However, although teacher salaries have increased at MSDB and are comparative to the salaries offered at Great Falls Public Schools, MSDB teachers work with a population of students that are more challenging overall than students in a typical Great Falls public school.

In Idaho, Colorado and Oregon, the schools for deaf and blind students have starting salaries similar to MSDB's current entry level. The following bullets detail each school's entry level starting teacher salary as of the 2007-08 school year.

- ♦ Idaho \$31,000
- ♦ Colorado \$30,494
- ♦ Oregon \$29,415

Educator retention trends were examined by reviewing employee personnel files. We examined data for the past three years. Retention data indicates if educators are employed

for five years or more at MSDB, they are more likely to stay employed at MSDB. We also noted, educator retention numbers are similar between those who have been employed with MSDB for less than five years (9 educators) and those with longevity of sixteen years or more (10 educators).

Parents are Satisfied with MSDB's Education

MSDB distributes a survey each spring to parents of students at MSDB. Parents are asked to rate various aspects about the school and education provided to students. Each category is scored so as to be able to compare results from year to year. In comparing the past four years, parent respondents' agreement with the school challenging their child has remained relatively constant. A majority of parent respondents agree that the school performs well academically and this rating is slightly up over the past four years. Parent respondents' ratings were slightly down for the spring of 2007 over the past four years when responding to the statement, "The school's instruction is designed to meet my child's needs." The rating dropped from a majority stating they strongly agree to a majority stating they agree. Overall, parents were positive about the school and the education it provides.

CONCLUSION

MSDB has taken steps to provide a commensurate education.

Based on accreditation standards, educator credentials, recruitment and retention data, student assessment scores, academic curriculum, and parent survey responses, MSDB provides its students an education similar to that provided to students in public schools.

Transitional Services Offered at MSDB

As part of the educational process, MSDB provides transitional services to students during high school as well as after graduation. MSDB is required by section 20-8-102 (4), MCA, to provide an education "that will enable children being served by the school to become independent and self-sustaining citizens." In addition, section 20-8-116(1), MCA, requires the school to assist in locating suitable employment for persons in attendance at the school. In an effort to meet the requirements of state law, MSDB offers a transition program for all high school students. The purpose of this program is to better prepare students for the everyday world and life after high school. The transition program allows students to gain independence and assume the responsibilities of the adult world.

Students in grades 9-12 are exposed to a curriculum that introduces them to daily living skills and concepts. The curriculum takes the student through a variety of levels and focuses on the needs of the individual student. Students have the opportunity to take

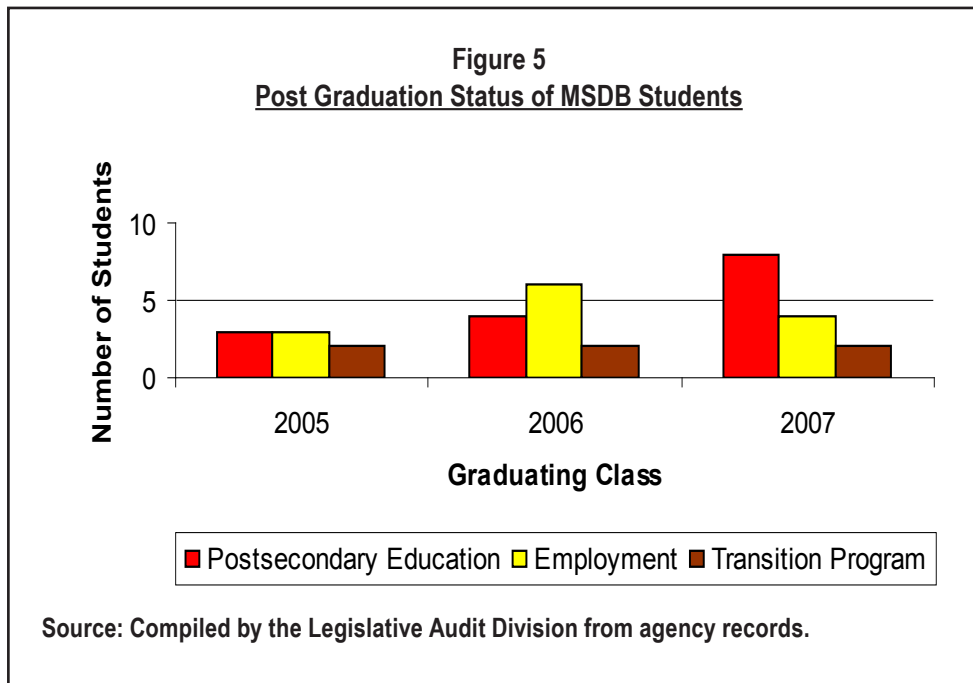
part in an on-campus work program as well as off-campus employment. Interviews with three off-campus employers for MSDB indicate working with the school and the students has been a positive experience. Some employers stated students took on apprenticeships with them and became employed full-time. In other instances, students chose to enroll in postsecondary education or leave the area upon graduation. In a majority of the off-campus employment placements, MSDB provides a monetary incentive to the employers by subsidizing wages. This allows students the opportunity to secure a position with the employer and gain valuable experience in an off-campus position. The integrated transition curriculum enables students to successfully transition to employment and/or enroll in postsecondary school upon graduation from high school.

Independent Life Skills Program

The independent life skills program is offered as a component of the residential program. This program is designed for seniors or graduates who would like additional transitional services and opportunities for independence. The independent life skills program allows high school seniors and graduates to live in an on-campus apartment-like setting with limited supervision. Through this component, students practice home, money, and time management skills as well as the ability to be self-disciplined and cooperate with roommates.

Transition Services for Students After Graduation

Students who enroll in transitional services post-graduation, as opposed to those students who take part when they are juniors or seniors in high school, tend to need more guidance in transitioning into the adult, independent world. The program provides additional support in these areas. At some point during the transition program, these students either determine they can succeed on their own or decide they need to return home. The number of students that choose to return home after post-graduation transition is about half of those who originally enroll. The following chart illustrates the number of students who enroll in transition as compared with those who go on to postsecondary education or employment after graduation.



As the figure illustrates, the students who enroll in the transition program comprise the smallest number of post-graduation activity. Even though the post graduation transition program serves a small number of students, the transition curriculum which is integrated throughout high school, serves all students.

Parents and Students Satisfied with Transition Services Offered at MSDB

MSDB surveys students and parents annually. Survey results indicate both high school seniors and parents who responded to the survey are satisfied with the transition program. A survey issued May 2007, reports 86 percent of parent respondents either agree or strongly agree that MSDB succeeds in preparing students for the future. In addition, a majority of parent respondents stated they are satisfied with the transition services offered at MSDB. One hundred percent of high school seniors, who responded to the survey, said the school assisted them in post graduation planning.

MSDB Collaborates with Other Entities to Assist Students with Transition

In an effort to assist students with job placement and vocational education options, and as required by section 20-8-116, MCA, MSDB works with applicable county, state and federal agencies. For example, last fall the school hosted a transition seminar for high school students and their parents. Representatives from various state entities such as Vocational Rehabilitation, Blind and Low Vision Services, and the Division

of Developmental Disabilities were present. In addition, representatives were present to provide information from Gallaudet University, a university in liberal education and career development for deaf and hard-of-hearing students. These entities provided information about developing transition plans for students, applying for scholarships, and making applications to postsecondary education and training programs.

CONCLUSION

MSDB provides transition services.

MSDB's transition, independent life skills, and work experience programs focus on providing students with the knowledge and experience to transition into independent adults. MSDB complies with Title 20, chapter 8, part 1, MCA, relating to its responsibilities for assisting students becoming self-sustaining citizens and locating employment.

Chapter IV – School Safety

Introduction

This chapter details audit work conducted in relation to our fourth objective regarding the level of safety measures on the Montana School for the Deaf and Blind (MSDB) campus.

Standard Practices Provide a Foundation for School Safety

In an effort to provide a foundation for safety measures, MSDB has numerous safety policies for students, staff and visitors. MSDB policies are wide-ranging covering such topics as communicable disease, task specific safety training, emergency evacuation, access control to buildings and grounds, and background checks of personnel. We noted MSDB complies with, and enforces its safety policies in numerous ways. MSDB runs a background check via fingerprints for all newly hired employees. This is a standard practice for schools to ensure students' safety. As part of new staff orientation, safety training is conducted with each new staff person. Through this training, safety policies and procedures are reviewed and new personnel sign a statement saying they understand and have been trained on MSDB safety policies. In addition to their own school policies, MSDB adheres to Great Falls City fire codes.

MSDB Meets State Guidelines for a Safe School

According to the Office of Public Instruction's (OPI) Safe Schools Guidelines, components of a safe school include:

- ◆ Well maintained facilities, grounds and perimeters.
- ◆ Controlled access and notices directing visitors to the proper access.
- ◆ Well-lighted areas.
- ◆ Trained staff.
- ◆ Staff prepared to respond to crisis or threats.
- ◆ Clearly written expectations and consequences of behavior for students and staff.

MSDB has all of the above-mentioned components recommended for a safe school. The school grounds are well maintained, and at night the campus is well lit. The photograph on the following page shows the main walkway through campus with the residential buildings on the left side.

Figure 6
Main Walkway through MSDB Campus



Source: Image taken by the Legislative Audit Division.

The campus grounds, as well as the buildings have controlled access. The MSDB campus has fencing around portions of it. The fences serve to direct foot traffic around the campus rather than across the campus. Figure 7 provides an example of fencing.

Figure 7
MSDB Playground with Fencing



Source: Image taken by the Legislative Audit Division.

In addition to controlling pedestrian traffic in the area, the school has controlled access to buildings. Visitors must go to the main doors in a building, as all other doors are locked. Expectations are written via safety policies and communicated during staff orientation.

How MSDB Compares to Other Schools' Safety Measures

We examined the safety measures of Great Falls Public Schools and the North Dakota School for the Deaf (NDSB). We chose these two schools because of the similarities to MSDB. NDSB is a state special school and has a comparable community size, rural setting, and student demographics. Great Falls schools have the exact same community setting but a different population of students. Interviews conducted with personnel at Great Falls Public Schools (one being directly across the street from MSDB) indicate MSDB is considered a safe school and more proactive about safety than some of the individual schools within the Great Falls School District. For example, some Great Falls schools do not always employ controlled entry access; side and back doors are accessible to the public.

NDSB in Devils Lake, North Dakota has approximately the same number of students and is located in a rural community approximately the same size as Great Falls. In comparing the safety measures of the NDSB and MSDB, there are similarities such as surveillance cameras on campus, a disaster recovery plan, evacuation drills, and a controlled entry access. However, North Dakota uses proximity cards to control access whereas MSDB uses keys. The lock system currently being used at MSDB was installed in 1972. MSDB has expressed an interest in replacing the lock system on all doors, including the seven main entrances, and consideration has been given to replacing at least a portion of the key system with proximity cards. Replacing the lock system has not yet become a priority to MSDB because of cost.

Additional Safety Measures Added at MSDB

With the increase in school violence nationwide, MSDB has begun to take precautionary steps to provide assurance that the school is a safe place. During the 2007 Legislative Session, the legislature appropriated \$75,000 for maintenance. MSDB management indicates they will use this additional funding for safety assurances as well as maintenance issues that arise. The school conducts at least eight evacuation drills (four fire, and four disaster) a year and has a crisis management plan in place which was developed in conjunction with the Great Falls City Police. MSDB has had a couple of occurrences of vandalism and theft to buildings, but no other major instances of violence. In response to the vandalism, four video surveillance cameras were installed in December 2007 to deter vandalism as well as assist in identifying vandals. MSDB has a contract to install seven doors on 12 of its open classrooms. One of the main buildings on campus, which houses all of the classrooms for the visually impaired students, was designed and built in the 1970's and has an open floor plan. During lockdown drills and an actual lockdown (if there was one), students have to be moved to classrooms with doors. In addition, a door on a classroom provides a barrier between students and fire, if one was to occur in the building. The remaining six doors are scheduled to be installed by the fall of 2008.

Continual Review of Safety Assurances is Important

In the 2007 annual surveys conducted by MSDB, the majority of students surveyed stated they felt safe at school. In addition, a majority of parents surveyed stated they felt MSDB was a safe place for their student. Feeling safe is a vital component of a productive learning environment. In a society where school violence has risen dramatically over the years, it is important to continually evaluate the level of safety assurances on a school campus.

CONCLUSION

MSDB has taken steps to assure student safety.

MSDB has recently added additional safety measures; periodically reviewing safety assures its importance.

Chapter V – Outreach Services

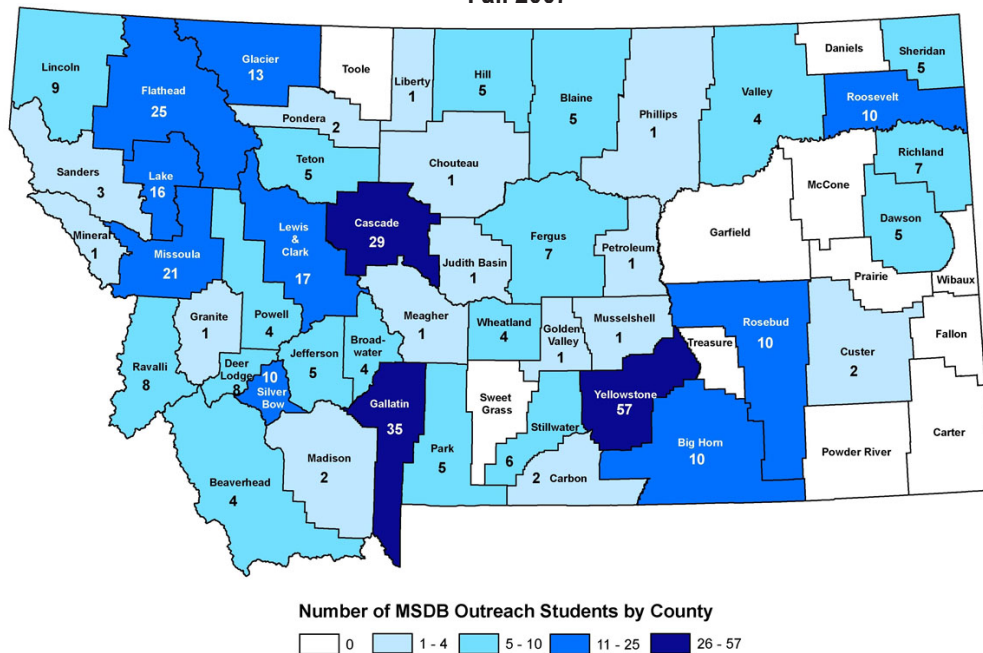
Introduction

In addition to providing services for hearing and visually impaired students on the campus in Great Falls, the Montana School for the Deaf and Blind (MSDB) provides services to students in public schools across the state. A majority of children with hearing and visual impairments are educated in the public school system. Outreach serves approximately 360 students. Our fifth audit objective examined the efficiency of the outreach program. Audit work conducted to determine outreach efficiency included interviews with outreach personnel, reviewing position descriptions and annual outreach satisfaction survey responses as well as analyzing workload information. This chapter discusses MSDB's outreach program and services provided.

Outreach Provides Support for Sensory Impaired Students

The outreach program is a key component of MSDB. MSDB employs ten outreach consultants who travel around the state providing services for the deaf/hard of hearing and visually impaired students in the state of Montana. Outreach provides technical assistance to parents, school districts, and professionals who serve the state's deaf and blind children. Outreach assistance consists of consultation with local district staff and parents on issues pertaining to the development and implementation of appropriate educational services. Services may also include staff training specific to the individual needs of a student. For those students not enrolled at MSDB, the outreach program serves to provide technical assistance on how to improve access to the curriculum offered in public schools. The majority of Montana's school districts do not employ teachers of the deaf or teachers of the blind, and lack the resources necessary to meet the needs of sensory impaired students. At the time of the audit, only three districts across the state employed teachers with additional training in the fields of deafness or blindness. As a result, MSDB outreach services are vital to the public schools. The following figure illustrates the counties served by MSDB's outreach program and includes actual numbers of students served in each county.

Figure 8
Outreach Activity by County
Fall 2007



Source: Compiled by the Legislative Audit Division from agency records.

Charge for Services

Section 20-8-102(2), MCA, allows MSDB to charge a fee for services provided to school districts. Currently MSDB does not elect to utilize the fee option. In the early 1990's, MSDB chose to charge districts a fee for services. The charge was \$400 for a student with high service needs, and \$200 for a student with low service needs. Schools did not have the funding to pay for outreach services; therefore the majority of schools did not utilize MSDB's outreach program. During the two-year period in which fees were charged, a majority of students who needed specialized services did not receive them. Outreach services are currently funded through the same means as the school.

Family Advisors Provide In-home Support

In addition to outreach consultants, MSDB employs twenty-eight part-time family advisors for the outreach program. Family advisors report to the outreach consultant responsible for the respective geographic area in which the advisor is working. Family advisors go into homes of nonschool-aged children with sensory impairments and provide technical support for the family. For children with sensory impairments, it is important to provide services as early as possible because these children need to be

systematically taught concepts. They do not absorb information and skills as a typical toddler would. The utilization of family advisors has been around since the early 1980's and is derived from the SKI-HI Institute which is a unit of the Department of Communicative Disorders at Utah State University, Logan. The SKI-HI curriculum is used by MSDB outreach personnel to assist with the development of deaf/hard of hearing infants and toddlers. MSDB is considering options to serve visually impaired infants and toddlers. A majority of the family advisors are retired individuals with an interest in blind or deaf education. The maximum hours worked by family advisors is around 100 hours annually.

Outreach Caseload

MSDB employs 11 outreach consultants three of which are part-time. Six outreach consultants provide services to visually impaired students and five consultants provide services for deaf and hard of hearing students. Caseloads are primarily divided among consultants by geographic area; however, there is also an attempt to equalize the intensity of cases among outreach consultants. Intensity of students is quantified using a scale of 1-5, with a 5 being the most severe. Intensity of a 5 usually constitutes the student attending MSDB. Outreach serves students with quantified ratings of 1-4. The intensity of a 1 requires the least amount of support from outreach. For an intensity 1 student, consultants visit the school and student monthly, checking in. For the most part, this type of student is functioning well in a mainstream classroom. Students quantified as 2-4 have an increase in severity as well as the services that need to be provided. A intensity 4 student may need services weekly from the outreach consultant.

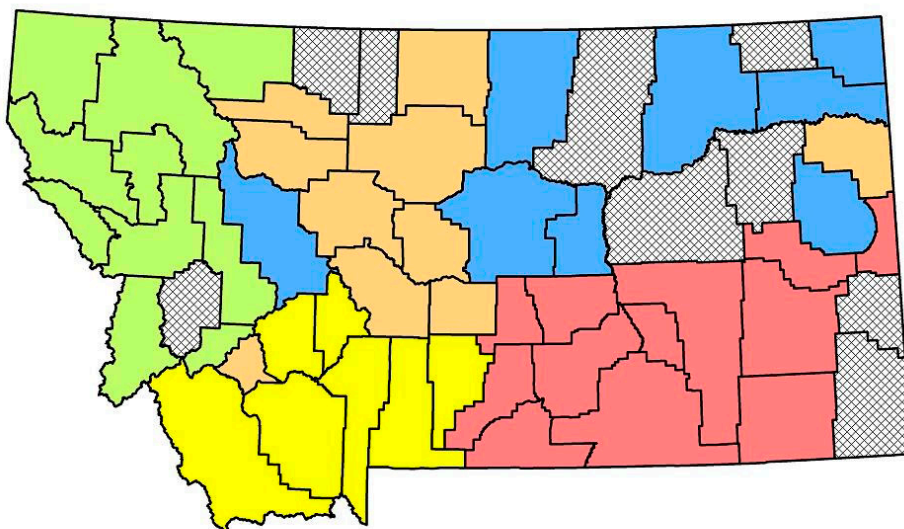
Outreach consultants' caseloads range from a low of twenty-one to a high of seventy-one students for the current school year. At times, consultants working with the students of the same impairment, interface their geographic areas. For example, if a student moves to a different town in Montana the consultant may still travel to provide services to that particular student because an established relationship exists. Another example of interfacing occurs when two consultants overlap an area but serve different ages of students. One consultant may prefer working with younger children and another works well with older children. Therefore, they both may provide services to an area but not to the same students.

In addition to intensity of impairment and the number of students visited, the number of miles driven affects outreach caseload. This factor depends on the area a consultant covers. Montana is a large rural state with many school districts, so outreach consultants travel extensively. It is not unusual for some consultants to drive 1,200 miles a week. In an attempt to compensate outreach consultants for the extensive travel required, consultants receive an additional annual \$2,000 travel stipend. The following maps illustrate

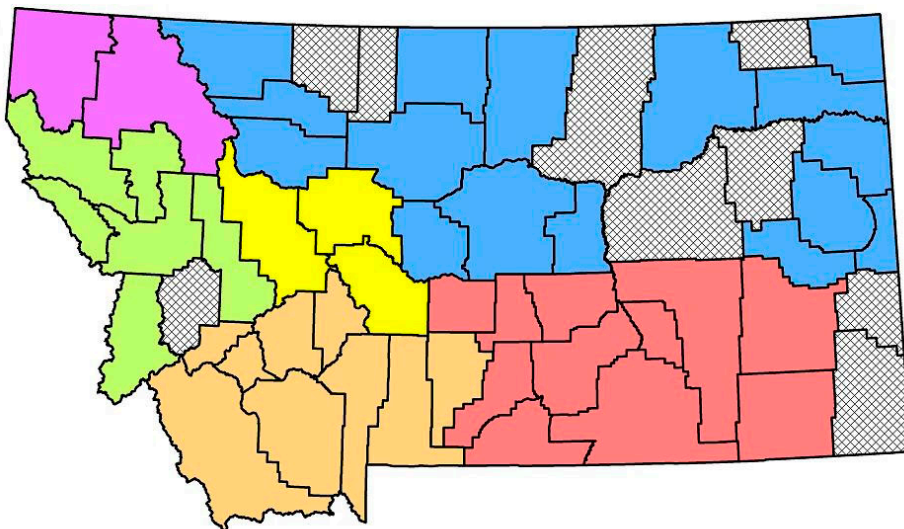
the geographical areas of outreach consultants. Each color on each map represents a different outreach consultant's service area.


Figure 9
Geographical Regions of MSDB Outreach Consultants
Fall 2007

Hearing Impaired Outreach Areas - 139 Students



Visually Impaired Outreach Areas - 223 Students



 **Counties With No Outreach Students**

Source: Compiled by the Legislative Audit Division from agency records.

Outreach's Total Caseload is Growing

More and more sensory impaired students are being served through the public school districts of Montana. MSDB set a performance goal for the 2007-08 school year to reduce caseloads to around 20-23 cases per consultant. The consultants for deaf/hard of hearing students have reduced their caseloads to an average of 27 by adding three more consultants. Total caseload for both the hearing and visually impaired have increased from the 2006-07 school year. The following table details the total caseload in conjunction with the number of outreach consultants for the deaf/hard of hearing as well as for the blind/visually impaired. Caseload numbers below are a snapshot for the school year and represent children age 0-21.

Table 1
MSDB Outreach Total Caseload by Impairment

Impairment		2005-06 school year	2006-07 school year	2007-08 school year
Deaf/Hard of Hearing	Number of outreach consultants	2	2	5
	Students being served by MSDB outreach	99	103	139
Visually Impaired	Number of outreach consultants	5.5	5.5	5.5
	Students being served by MSDB outreach	187	215	223

Source: Compiled by the Legislative Audit Division from agency records.

Parents/Educators Satisfied with Outreach Services

MSDB distributes outreach satisfaction surveys to parents and educators in the school districts annually. For surveys sent out to educators and parents in spring of 2007, the response rate was 54 percent and 23 percent respectively. Overall, survey respondents were positive. A majority of educators either agreed or strongly agreed that outreach consultants are accessible (99 percent), as well as sensitive to the challenges educators and parents face in meeting the needs of their student (93 percent). A majority of parent respondents either agreed or strongly agreed (98 percent) that outreach consultants improve communication among people in the schools working with their child.

Twenty-six percent of parent respondents and 15 percent of educator respondents commented there was a need for more consultants and more time available from consultants when they visit schools.

Outreach Workload

Based on growing caseloads and survey results, we examined management of workload levels. Workload refers to all activities performed by outreach consultants including face to face contact. Workload also includes many other indirect services necessary to support the students' education program such as phone calls, letters, individualized education program meetings, staff training, collaboration with teachers, meeting with parents, and designing student service plans, as well as curriculum for instructional modification. Additional factors which affect workload are the severity of students' impairments and the number of miles traveled by each outreach consultant.

How MSDB Currently Manages Workload

MSDB collects some information on outreach workload. As noted earlier, MSDB management uses data on the severity of students' impairment and geographical areas of the state to determine caseload for each consultant. MSDB management also collects other workload data on a weekly basis. Information collected weekly includes number and type of contacts, services provided to each student, and date services are conducted. MSDB management does not routinely collect data on time spent conducting workload activities such as miles traveled.

Increased Caseload Equals Increased Workload

According to the American Speech-Language Hearing Association (ASHA), an increase in caseload corresponds with a simultaneous increase in workload. To effectively balance workload, ASHA recommends a workload analysis and ongoing assessments conducted periodically. In order to analyze workload, accurate data must be collected on the amount of time spent on each workload activity so as to effectively prioritize workload activities for the day or week. Time data could be gathered on workload activities such as contacts made via e-mail and phone, writing up reports, and time spent in meetings. This information is in turn used to determine the number of students that can be served by an outreach consultant in a day or week.

Resource management becomes more critical as caseloads increase and recruitment and retention continue to be an issue. For example, one outreach consultant has been covering a large geographical area (over 1,000 miles a week) with a high caseload (60 students), for the majority of the current school year because MSDB has been unable to recruit an additional consultant. Staff states that workload can become crisis driven due to a large geographical area and high caseload. Staff also state that it is not uncommon for a small number of students and the associated workload that accompanies each student to comprise the majority of one's time.

Even though workload data is collected, all information collected is not relevant and/or used to manage outreach workload, but rather as an oversight function to assure outreach consultants are accountable for their working hours. MSDB management has not conducted a workload analysis recently. Collecting relevant data will assist in better workload management.

RECOMMENDATION #2

We recommend the Montana School for the Deaf and Blind:

- A. *Determine workload factors for outreach.*
 - B. *Collect data on relevant activities for outreach consultants.*
-

MONTANA SCHOOL
FOR THE DEAF
AND BLIND

AGENCY RESPONSE

Montana School for the Deaf and the Blind - Response to Performance Audit

The Montana School for the Deaf and the Blind appreciates the work of Bridget, Lisa and the Legislative Audit Division. The administration is appreciative of the audit findings that 80% of total agency funds are used to provide services to children; that in part, these services support students through transition activities to become independent and self-sustaining adults; and that the School takes its responsibility for student safety seriously and has an inclusive process and comprehensive plan for reviewing and assuring student and staff security on its campus.

Recommendation #1

We recommend the Montana School for the Deaf and the Blind work with the Office of Public Instruction to:

- A. Examine the efforts required to comply with Title I of No Child Left Behind and if appropriate, use free and reduced lunch counts as the factor to ensure the school receives equitable distributions of Title I and state at-risk funds.
- B. Secure Individuals with Disabilities Education Act moneys for the school based on the poverty factor.

Response: Concur with Recommendation #1 (A and B)

Within the parameters of the State's plan to address the NCLB and the definition of, and role the School plays in that plan, the Montana School for the Deaf and Blind concurs with recommendation #1-A and prior to the end of FY09 will work with the Office of Public Instruction to examine appropriate factors including the use of free and reduced lunch count as a basis for receiving Title I and state at-risk funds.

The Montana School for the Deaf and Blind concurs with recommendation #1-B and prior to the end of FY09 will work with the Office of Public Instruction to examine the potential for the School to secure additional IDEA moneys based on the additional factor of poverty.

Recommendation #2

We recommend the Montana School for the Deaf and the Blind:

- A. Determine workload factors for outreach.
- B. Collect data on relevant activities for outreach consultants.

Response: Concur with Recommendation #2 (A and B)

Though the School does collect workload information as stated on page 30 of the report, the administration does concur with recommendation #2 A and B and over the next school year will investigate outreach program/service models in neighboring states to decide what data can be collected about workload factors/activities which will lead to a methodology that most effectively determines caseload and work assignments/activities. This analysis and the implementation of new factors found to improve services or make service deliver more efficient, will be completed by the end of FY09.